

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: FACEBOOK, INC. CONSUMER
PRIVACY USER PROFILE LITIGATION,

This document relates to:

ALL ACTIONS

CASE NO. 3:18-MD-02843-VC

**DECLARATION OF HEATHER L.
RICHARDSON IN SUPPORT OF
FACEBOOK, INC.'S STATEMENT IN
SUPPORT OF PLAINTIFFS'
ADMINISTRATIVE MOTION TO
CONSIDER WHETHER ANOTHER
PARTY'S MATERIALS SHOULD BE
SEALED**

I, Heather L. Richardson, hereby declare as follows:

1. I am a partner at the law firm of Gibson, Dunn & Crutcher LLP, counsel of record for Facebook, Inc. (“Facebook”) in the above-captioned matter. I am a member in good standing of the State Bar of California. I submit this declaration in support of Facebook’s Administrative Motion To File Under Seal Special Master’s Order Following May 17, 2022 Hearing Regarding Production Of Named Plaintiff Data. I make this declaration on my own knowledge, and I would testify to the matters stated herein under oath if called upon to do so.

2. A true and correct redacted version of Exhibit 5 to the Declaration of Lesley E. Weaver In Support Of Plaintiffs’ Administrative Motion To Consider Whether Another Party’s Materials Should Be Sealed (“Exhibit 5”), as filed at Dkt. 934-4, is attached hereto.

3. Facebook proposes to seal limited portions of Exhibit 5 that contain confidential information regarding Facebook’s privacy and platform policy enforcement practices, including how Facebook searches for and investigates apps that may be violating its policies. Ex. 5 at 232:12–22, 233: 15–22, 271:19–272:1, 273:9–15. I am informed and believe that public disclosure of details regarding Facebook’s policy-enforcement efforts would reveal confidential information regarding Facebook’s internal operations that could be used by bad actors to attempt to circumvent and evade Facebook’s enforcement strategies, potentially harming Facebook and its users.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on June 2, 2022 in Los Angeles, California.

/s/ Heather L. Richardson

Heather L. Richardson